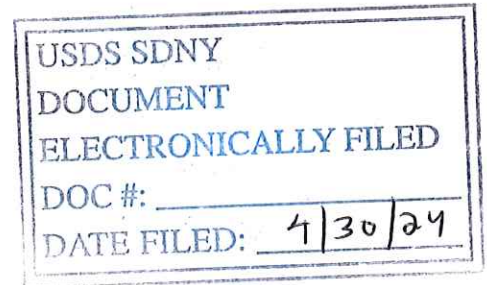




April 30, 2024

VIA ECF

Hon. Kimba M. Wood  
 Daniel Patrick Moynihan  
 United States Courthouse  
 Courtroom 26A  
 500 Pearl St.  
 New York, NY 10007-1312  
 WoodNYSDCchambers@nysd.uscourts.gov



MEMO ENDORSED

Re: *United States of America v. Tenzin Norbu*,  
 No. 1:24-CR-00159-KMW

Dear Judge Wood,

We write pursuant to the Court's minute entry order dated March 5, 2024 (ECF No. 11), and the Order entered that same day (ECF No. 13).

We respectfully request that Mr. Norbu's bail conditions be modified to expand the permitted areas of travel to include New Jersey and the Northern District of New York. This modification would allow Mr. Norbu to visit two Buddhist temples for his religious fulfillment. The two temples and corresponding addresses are as follows:

Granted

Dharmakaya Center for Wellbeing  
 191 Cragmoor Rd  
 Pine Bush, NY 12566

Tsechen Kunchab Ling  
 12 Edmunds Ln  
 Walden, NY 12586

All other conditions for Mr. Norbu's bail, including electronic monitoring, would remain the same. This request was discussed with Mr. Norbu's Pre-Trial Services Officer, and Pre-Trial Services consents to this modification. The Government does not oppose this modification.

Respectfully submitted,

/s/ John T. Zach  
 John T. Zach  
 Virginia Su

cc: Benjamin M. Burkett (Benjamin.Burkett@usdoj.gov)  
 Getzel Berger (Getzel.Berger@usdoj.gov)

SO ORDERED: N.Y., N.Y. 4/30/24

BOIES SCHILLER FLEXNER LLP

*Kimba M. Wood*  
 KIMBA M. WOOD

U.S.D.J.